

UNITED STATES BANKRUPTCY COURT

Eastern District of Pennsylvania

Philadelphia Division

Campisi Construction, Inc.

: Chapter 7

FILED

JUN 13 2024

: Case No. 14-12458

TIMOTHY M. O'BRIEN, CLERK
DEB CLERK

Debtor. :

ANSWERS TO ECI,LLC MOTION TO REMAND

Co-debtor, Anthony Campisi, moves this Honorable Court to DENY ECI's Motion to Remand.

1. Paragraph 9 of the Stipulation and Consent Order of Settlement clearly states this Court holds jurisdiction of the Settlement Agreement.
2. ECI is now back pedaling to avoid a hearing on all his wrong doings.
3. All ECI and Cougar claims are false claims.
 - a) ECI claim #7 secured. In my previous filing ECI claim and judgement were based on CASPA interest. Please see attached Decision where CASPA was not awarded.

EXHIBIT A

- b) ECI claim #8 all invoices were paid plus dated before judgment was entered attached is Forensic accounting report.

EXHIBIT B

- c) Cougar claim # 9 is a fake lease signed for his financing. Dave Spause needed a signed lease to by that building. He or Cougar did not own the property. The lease was a two year lease, Campisi never occupied, paid security deposit or paid a dime. **Cougar renewed the lease for another two years**, what landlord would do that?? Better yet what Judge would believe that.

EXHIBIT C

d) claim #11 interest and attorneys fee's under CASPA. Refer back to decision ECI was not awarded CASPA

EXHIBIT D

4. The Motion to approve settlement paragraph 6 states parties propose to resolve within the principles of In re Martin 91 F.3d 389, 393 (3d Cir. 1996)

The first factor probability of success in the litigation. Please find attached Montco Case 2013-34907 Doc 80 Motion for Summary Judgement against Campisi Construction ONLY.

5. Cougar states the proof of claim has been litigated (paragraph 5 UNDER CONTEST.) Settlement agreement says settled matters *sub judice another misrepresentation* by Robert Saraceni and Spause. **EXHIBIT E**

6. Saraceni and Spause have done this with each claim, never served the trustee, got judgments and are trying to collect on myself.

7. ECI had stolen abandoned equipment on JULY 2 2016 and newer equipment stating the Trustee allowed him to gather and assemble the assets.

8. ECI's stay was lifted April 2 ,2018 and they were to pursue Anthony Campisi as an individual. Each listed on the Order by Judge Fitzimon had been violated.

EXHIBIT G

In conclusion , Saracini/Spause were afraid to meet me in court .I caught on to their game years ago, now he has put himself in a real pickle. Wherefor, Co- Debtor, Anthony G Campisi prays the Motion to Remand is denied and a trial on The Motion for sanctions be heard.

Anthony Campisi



6/13/2024